

The current oral argument date falls on the seventh day of Passover which, as observed by undersigned counsel, is a religious holiday on which no business is conducted. Petitioner respectfully submits such religious observance constitutes an “extraordinary cause for a continuance” pursuant to Circuit Rule 34(g) and asks that oral argument be rescheduled to a future date convenient for the Court.

To aid in the Court's determination of a new date, Petitioner respectfully advises the Court counsel for the Board is unavailable March 18–22, and April 2, and the undersigned is unavailable April 5, and May 16–17.

The request to reschedule oral argument is made by counsel in good faith, and not for the purpose of delay or other procedural advantage.

Dated: New York, New York
February 21, 2019

Respectfully submitted,

MICHELMAN & ROBINSON, LLP

By: /s/ Jon Schuyler Brooks

Jon Schuyler Brooks
800 Third Avenue, 24th Floor
New York, NY 10022
(212) 730-7700
jbrooks@mrlp.com
Attorneys for Petitioner

